

REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested in view of the above amendment in conjunction with a concurrently filed RCE.

The Examiner is thanked for providing a relatively detailed Advisory Action dated 12/29/2005. It appears that the Examiner equates a computer-telephony integration (CTI) system (which inherently includes a lot of intelligent signal processing capability) with the applicant's claimed network terminating unit (NTU) that heretofore has not had sufficient intelligent signal processing capability so as to link together packets sent via a signalling channel, etc.

In an effort to overcome this (over broad in applicant's view) interpretation of applicant's claim language, claims 16 and 28 have now been cancelled with all other claims now amended so as to specifically be limited to an ISDN network terminating unit communicating via an ISDN communication link, etc. Clearly there is no teaching or suggestion in Kessler of using his CTI as an NTU in an ISDN communication link environment as now claimed.

For example, in prior office actions, the Examiner has relied upon Miloslavsky at page 3, paragraph 47 as allegedly making claims 16 and 28 "obvious". However, paragraph 47 deals with an automatic call distributor (ACD)/private branch exchange (PBX) 112. Reference is made to a high bandwidth port 144 at one side of the ACD/PBX

and a plurality of low bandwidth ports 146-145 (apparently labeled 146-150 in Fig. 1) at the other side of the ACD/PBX. While it is indicated that the high bandwidth port 144 may well be connected for communication via an ISDN channel, there is no indication that the ACD/PBX 112 has any capability whatsoever for linking partial data in separate ISDN signalling messages together so as to re-constitute data from a plurality of ISDN signalling messages.

In short, historically ISDN network terminating units have been relatively "dumb" terminals. In particular, they have not included sufficient intelligent processing capability so as to link together separate ISDN signalling messages and re-constitute data from a plurality of such signalling messages -- as is required in all of applicant's claims.

The Miloslavsky teaching is directed primarily to the complexities of the entire CTI system -- not to one of its peripheral elements, namely the ACD/PBX 112 briefly described at paragraph 47 on page 3. In particular, this paragraph does not in any way teach or suggest the applicant's claimed invention for reasons such as those already noted above. If there is an ISDN NTU anywhere in Miloslavsky, it would be the ACD/PBX 112 -- but there is no teaching that the ACD/PBX has the functionality required by applicant's claims.

Recognizing some deficiencies of this nature with Miloslavsky, the Examiner has also relied upon Kessler with respect to some subsidiary features of other dependent claims.

However, Kessler does not teach that detected messages comprise sufficient information to enable the network terminating unit to establish how parts of data have the same predetermined type sent in separate messages are linked. the first octet of the Q931 message is the protocol discriminator information element, which specifies the protocol that was used to encode the transmission. But, as Kessler notes in the second full paragraph on pages 145, "only two layer 3 protocols are expected to be used over the D channel: Q931 and X25." Table 7-1 which Kessler says lists the values and interpretations of the protocol discriminator was supplied with the office action and is presently unavailable to the undersigned. Table 7-3 (on page 151) does list Q931 information elements, but from the information which the Examiner has supplied one cannot tell where these information elements occur, nor under what circumstances.


Of more relevance is the entry that appears on page 729 under the heading "More Data". It is believed that the user information messages may be those used in the present invention -- however not via the provision of a "smart" NTU as in applicant's claimed invention.

MALLET et al
Appl. No. 09/936,176
February 13, 2006

Accordingly, this entire application is now believed to be in allowable condition
and a formal Notice to that effect is respectfully solicited.

Respectfully submitted,

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